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July 20, 1998

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Federal Communications Commission
Office of the Secretary
1919 M Street, NW, Room 222
Washington, DC 20554

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Dear Commission Members:

Re: **WT Docket No 98-87, Notice of Proposed Rule Making on
Telecommunications Relay Services**

I am writing in regard to the proposed rule making on Telecommunications Relay Services. I am a Deaf consumer of services and the Executive Director of the National Catholic Office for the Deaf (NCOD). Equitable access is very important to my ability to perform the duties of my position effectively and efficiently. In addition to me, one staff member is Deaf and one is Hard of Hearing. We are pleased to see proposals which clearly benefit hearing and speech-disabled Americans' access to advanced telecommunications services such as:

--To allow the costs of providing interstate "improved" relay services to be reimbursed from the interstate Telecommunications Relay System (TRS) Fund.

--To require common carriers providing voice transmission services to provide Speech to Speech (STS) services to users with speech disabilities throughout their service areas within 2 years after formal adoption of the rule.

--To strengthen speed-of-answer requirements for TRS providers so 85% of all calls are answered within 10 seconds by a Communication Assistant prepared to place the TRS call at that time.

However, I believe it is in the best interest of Deaf and Hard of Hearing citizens, as well as hearing citizens whom we communicate with, to also provide TRS access to audiotext and pay-per-call services. These services are increasingly used by businesses in the United States, presenting substantial barriers to TRS users such as my staff and myself.

Thank you very much for considering my concerns listed above and hopefully incorporating them to strengthen the rules. This would truly make a difference in the way Deaf, Hard of Hearing and hearing citizens use TRS.

Sincerely,

Arvilla Rank
Executive Director

Enclosure (5 copies)

CC Karen Strauss

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